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November 14, 2024

VIA E-FILING

The Honorable John G. Koeltl
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 14A
New York, NY 10007-1312

Re: *Leadenhall Capital Partners LLP et al. v. Wander et al.*, No. 1:24-cv-3453-JGK

Dear Judge Koeltl:

We represent Plaintiffs Leadenhall Capital Partners and Leadenhall Life Insurance Linked Investments Fund PLC (“Leadenhall”) in the above-captioned action. On November 21, 2024, Leadenhall will respond to four separate motions to dismiss the complaint filed by Defendants on October 10, 2024. We write to notify the Court that Leadenhall intends to file a single, omnibus memorandum of law in opposition to the motions to dismiss, not to exceed 34,000 words. Defendants take no position on Leadenhall filing a single, omnibus opposition brief in response to their motions to dismiss.

On September 10, 2024, the Court so-ordered the parties’ stipulation providing for an expansion of word limits to their respective memoranda of law in connection with the motions to dismiss, permitting Defendants a total of 34,000 words for their opening briefs (10,000 words each for the 777 Entity Defendants¹ and Defendants Advantage Capital Holdings LLC/Kenneth King, and 7,000 words each for Defendants Josh Wander and Steven Pasko, who did not seek an expansion of the default word limits). ECF No. 193. Leadenhall was permitted a total of 34,000 words for its oppositions to Defendants’ motions. *Id.*

Defendants filed their motions to dismiss with four separate briefs on October 10, 2024. ECF Nos. 203–205, 209–215. Leadenhall intends to file a single, omnibus opposition brief responding to Defendants’ memoranda of law, not to exceed the limit of 34,000 words set by the Court’s prior order. ECF No. 193. Defendants have indicated that they take no position on

¹ The 777 Entity Defendants are 777 Partners LLC, 600 Partners LLC, SPLCSS III LLC, Signal SML 4 LLC, Insurety Agency Services LLC, Dorchester Receivables II LLC, SuttonPark Capital LLC, Signal Medical Receivables LLC, Insurety Capital LLC, and SuttonPark Servicing LLC.

November 14, 2024

Page 2 of 2

Leadenhall filing a single opposition brief rather than four separate briefs responding to each motion. Given that Leadenhall does not intend to seek any further expansion of word limits, we do not believe that any modification of the Court's prior order is required but defer to the Court as to whether any further clarification of the parties' stipulation would be preferred.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Leigh M. Nathanson
Leigh M. Nathanson

Counsel for Plaintiffs